

1 A. I BELIEVE SO.

2 Q. DO YOU KNOW WHAT COLOR IT IS IN THE ORIGINAL?

3 A. YOU KNOW, MY RECOLLECTION IS ORANGE BUT I'M
4 JUST --

5 Q. WHERE HAVE YOU SEEN IT . . .

6 A. I BELIEVE.

7 Q. . . . BEFORE IT WAS SENT TO YOU BY THE RUMMONDS
8 OFFICE?

9 A. I BELIEVE IN THE MATERIALS THAT TOBY PLEVIN HAS.

10 Q. AND THAT WAS WHEN YOU WERE INVOLVED IN SOME
11 LAWSUIT AGAINST THE CHURCH?

12 A. WHEN I WAS DOWN THERE GOING THROUGH HER STUFF,
13 HELPING HER WITH HER FILING.

14 Q. WITH WHICH CASE?

15 A. CROYDON, C-R-O-Y-D-O-N.

16 Q. WAS THAT THE FIRST TIME YOU HAD SEEN THIS
17 MATERIAL THAT YOU BELIEVE HAD AN ORANGE COVER?

18 A. I'M NOT -- AGAIN, I'M NOT SURE. I --

19 Q. YOU'RE NOT SURE WHETHER IT HAD AN ORANGE COVER?

20 A. I'M NOT SURE WHETHER IT HAD AN ORANGE COVER AND
21 I'M NOT SURE IF THE FIRST TIME WAS WHEN IT WAS IN TOBY'S.

22 Q. YOU MAY HAVE SEEN IT BEFORE THAT. BUT YOU'RE NOT
23 CERTAIN?

24 A. MAYBE.

25 Q. CAN YOU TAKE A SECOND TO REFLECT? THE CROYDON
26 CASE WAS WHEN, MR. ARMSTRONG? DID YOU SAY YOUR INVOLVEMENT

1 SECRETARIAL DUTIES TO HUBBARD, AND SHE WAS INVOLVED IN THE
2 PUBLICATION OF BOOKS.

3 Q. SHE HAD THIS? IS THAT WHAT YOU'RE SAYING?

4 A. I'M -- I'M CERTAIN NOW THAT I SAW IT INSIDE THE
5 ORGANIZATION, AND PUT TOGETHER BY THE COMPILATION -- THERE'S
6 A COMPILATIONS UNIT. BUT I DON'T RECALL THE NAME OF THE
7 WOMAN.

8 Q. WHERE DID YOU SEE IT? DID YOU SEE IT IN THE
9 CABINET, SITTING ON SOMEONE'S DESK? WHERE WAS THIS STUFF?

10 A. NO, IN HER AREA. IF I COULD JUST REMEMBER HER
11 NAME, THEN I COULD PUT THE WHOLE THING TOGETHER.

12 Q. DID YOU READ THROUGH IT WHEN YOU SAW IT IN HER
13 AREA?

14 A. NO, I GLANCED AT IT. I KNEW IT. I RECOGNIZED
15 IT, AND I REMEMBER COMPARING IT AT THE TIME WHEN I DID SEE
16 IT WITH THE WAY THE COMM COURSE -- BECAUSE THIS IS
17 ESSENTIALLY THE COMM COURSE WHICH HAD BEEN OFFERED WHEN I
18 FIRST GOT INVOLVED IN SCIENTOLOGY.

19 Q. HOW DID IT COMPARE? ARE THERE ANY DIFFERENCES AT
20 ALL?

21 A. OH, YEAH, THERE ARE DIFFERENCES. THIS IS A
22 SIMPLICATION. THE OTHER ONE FOLLOWED HUBBARD'S BULLETINS,
23 AND THESE ARE THINGS WHICH HAVE BEEN EXCERPTED FROM
24 HUBBARD'S BULLETINS AND THEN RESET IN THIS MANNER. BUT THE
25 DRILLS THEMSELVES, ALONG WITH THE NAME, PERSON DRILL,
26 PURPOSE AND PHENOMENON, THOSE ARE IDENTICAL. THE NUMBERS

1 ARE THE SAME, TR1, TR0.

2 Q. SO YOU ACTUALLY TOOK THE COMMUNICATIONS COURSE?

3 A. YEAH.

4 Q. FROM WHOM?

5 A. OH, I DID IT SEVERAL TIMES THROUGHOUT
6 SCIENTOLOGY. I DID IT WHEN I FIRST GOT INVOLVED. I WAS
7 SUPERVISED AT THAT TIME BY A GUY BY THE NAME OF JOHN AVERY.
8 AND THEN I SUPERVISED MYSELF WITH THE COMMUNICATIONS COURSE
9 IN 1970.

10 SO I WENT THROUGH A NUMBER OF DIFFERENT CLASSES,
11 CLASSES WHERE I SUPERVISED THIS COURSE. AND THEN THROUGHOUT
12 ALL OF YOUR TIME IN SCIENTOLOGY, YOU CONTINUE TO DO THESE
13 IDENTICAL TRAINING ROUTINES. ALL AUDITORS DO THEM. THEY'RE
14 REQUIRED, IN FACT, TO DO A SET OF THESE THINGS EVERY DAY, OR
15 THEY WERE WHEN I WAS INSIDE.

16 AND SO I DID THESE WHEN I TRAINED TO BE AN
17 AUDITOR. AND SO RIGHT UP UNTIL 1979, I GUESS, WAS THE LAST
18 TIME I DID TRAINING ROUTINES, TR'S.

19 (FIVE-MINUTE RECESS)

20 BY MS. REMMERS: Q. OKAY, WE WERE TALKING ABOUT
21 MATERIALS, AND I THINK YOU TESTIFIED THAT YOU HAD SEEN THEM
22 ON SOMEONE'S -- IN SOMEONE'S AREA. YOU CAN'T RECALL HER
23 NAME.

24 AND YOU JUST GLANCED THROUGH AND RECOGNIZED SOME
25 OF THE MATERIAL WAS SIMILAR TO THE COMM COURSE YOU HAD
26 TAKEN?

1 A. AROUND THE TIME THAT I LEFT THE ORGANIZATION,
2 THIS BOOKLET, BOOK, WAS CREATED WITHIN THE ORGANIZATION.
3 AND I SAW IT AT THAT TIME. THAT WAS THE FIRST TIME I SAW
4 IT.

5 Q. DID YOU HAVE ANYTHING TO DO WITH THE CREATION OF
6 THAT BOOK?

7 A. NO. I WORKED WITH THE UNIT WHO DID, WHO PUT IT
8 TOGETHER.

9 Q. WHAT UNIT PUT IT TOGETHER?

10 A. THE LRH COMPILATION UNIT.

11 Q. HOW DO YOU KNOW THAT?

12 A. THEY PUT TOGETHER THESE BOOKS.

13 Q. HOW DO YOU KNOW THIS PARTICULAR ONE WAS PUT
14 TOGETHER BY THAT UNIT?

15 A. I KNEW MELANIE MURRAY, PHOEBE MOWER, SHARON
16 STORER, JESSICA WALDMAN, ALL OF WHOM WERE PART OF THAT
17 GROUP.

18 Q. AND YOU'RE READING FROM THE DOCUMENT NOW?

19 A. THIS IS IT, YEAH.

20 Q. DID YOU EVER TALK TO ANY OF THOSE INDIVIDUALS
21 ABOUT THIS PARTICULAR COURSE OR BOOKLET?

22 A. I WASN'T INVOLVED WITH THIS COURSE PARTICULARLY.

23 Q. NOW, LET ME ASK YOU, YOU'VE ALSO PRODUCED
24 MATERIALS THAT WERE GIVEN TO YOU THAT ARE MATERIALS ON TIME
25 MANAGEMENT. THERE'S A COPY OF A SPIRAL NOTEBOOK THAT HAS
26 VARIOUS LITTLE CARTOONS IN IT.

1 HAVE YOU LOOKED THROUGH THIS MATERIAL?

2 A. YES.

3 Q. AND ALSO "HOW TO INCREASE EFFICIENCY IN YOUR
4 COMPANY" COURSE PACK. HAVE YOU LOOKED THROUGH THAT?

5 A. YES.

6 Q. HAD YOU, BEFORE IT WAS SENT TO YOU BY
7 MR. RUMMONDS, HAD YOU SEEN THAT MATERIAL BEFORE?

8 A. LET ME LOOK AT THEM, TOO, AGAIN.

9 Q. ACTUALLY THERE ARE TWO COPIES IN THIS. IN
10 LOOKING AT --

11 A. I DON'T BELIEVE I HAD EVER SEEN EITHER OF THESE
12 IN THE FORM THAT THEY'RE IN.

13 Q. HAD YOU SEEN SOME OF THOSE MATERIALS IN OTHER
14 FORMS?

15 A. YES.

16 Q. IN WHAT FORMS?

17 A. THIS DOCUMENT IS --

18 Q. CAN YOU IDENTIFY WHAT YOU'RE READING?

19 A. THIS IS HOW TO INCREASE EFFICIENCY IN YOUR
20 COMPANY. THIS DOCUMENT TAKES A NUMBER OF HUBBARD POLICIES
21 AND TECHNIQUES, DRILLS AND SO ON, AND HAS SIMPLY STRIPPED
22 OFF THE PARTS WHICH IDENTIFIED IT AS COMING FROM HIS
23 BULLETINS.

24 METHOD THREE WORD CLEARING. I THINK I SAW THE
25 THREE BASKET SYSTEM IN HERE. DEV-T, DEV-T ANALYSIS,
26 EXECUTIVE RESPONSIBILITY. THESE ARE ALL -- ALL THIS DEV-T

1 SUMMARY LIST, THESE ARE HUBBARD POLICIES WHICH COME FROM --
2 THEY'RE CALLED HUBBARD COMMUNICATION OFFICE POLICY LETTERS.

3 AND THEY WERE ORIGINALLY PUBLISHED BY HUBBARD AS
4 INDIVIDUAL POLICY LETTERS. HE WOULD PUBLISH ONE OF THESE
5 THINGS OR A NUMBER OF THEM ON A GIVEN DAY. AND THEY WERE
6 MIMEOGRAPHED.

7 AND THEY WERE CREATED DURING MY TIME IN THE
8 ORGANIZATION, FIRST ON BOARD THE SHIP, AND THEN IN
9 CLEARWATER, FLORIDA.

10 THEN THERE BEGAN A PROJECT IN APPROXIMATELY 1968,
11 BUT I BELIEVE CULMINATED -- BEGINNING IN 1971, THESE POLICY
12 LETTERS BEGAN TO BE PUT SELECTIVELY INTO BOOKS AND BOUND IN
13 WHAT BECAME KNOWN AS THE ORGANIZATION EXECUTIVE COURSE.

14 Q. DID YOU TAKE THAT COURSE?

15 A. I TOOK A LOT OF IT, AND I DID THE PARTS WHICH
16 RELATED TO MY INDIVIDUAL POST, AS I WENT THROUGH SCIENTOLOGY
17 OR THE SEA ORGANIZATION. BUT I RECOGNIZE -- I THINK I
18 RECOGNIZE THE TERMS, AND I RECOGNIZE EVERY ONE THAT I'VE
19 SEEN SO FAR AS COMING FROM THOSE POLICY LETTERS.

20 Q. AND THOSE WERE POLICY LETTERS THAT HUBBARD WANTED
21 OFFICE PEOPLE TO FOLLOW IN THEIR BUSINESS HABITS DURING THE
22 DAY; IS THAT THE IDEA?

23 A. THEY WERE THE POLICIES BY WHICH ALL SCIENTOLOGY
24 ORGANIZATIONS WERE OPERATED. THEY WERE THE RULES OF
25 SCIENTOLOGY.

26 Q. THE RULES OF HOW YOU RAN THE OFFICE OR THE RULES

1 OF YOUR BELIEF SYSTEM?

2 A. THERE IS NO BELIEF SYSTEM IN SCIENTOLOGY.
3 SCIENTOLOGY IS NOT PREDICATED UPON BELIEF. HUBBARD SAYS
4 IT'S SCIENTIFICALLY AND DEMONSTRABLY TRUE. IT DOES NOT
5 REQUIRE BELIEF.

6 SO BELIEF, WHEN ONE ENTERS SCIENTOLOGY, IS
7 SUSPENDED. AND ONE DOES WHAT ONE IS TOLD TO DO. AND PART
8 OF WHAT ONE IS TOLD TO DO IS TO FOLLOW IN AN UNDEVIATING
9 FASHION THE POLICIES AS LAID DOWN BY HUBBARD, WHICH IS WHAT
10 THESE ARE.

11 Q. OKAY, THE SPIRAL BINDER, HAD YOU SEEN THOSE
12 MATERIALS BEFORE? YOU SAID NOT IN THAT FORM?

13 A. NO, I DON'T RECALL SEEING ANY OF THESE THINGS. I
14 NOTE IN THE BIBLIOGRAPHY THAT THESE THINGS ARE TAKEN FROM,
15 AND I RECOGNIZE THE VARIOUS DATA ON EACH PAGE, BUT I HAVE
16 NOT SEEN THE THING PUT TOGETHER IN THIS FORM BEFORE THIS.

17 Q. DO YOU KNOW ANYBODY WHO WORKED FOR THE WORLD
18 INSTITUTE OF SCIENTOLOGY ENTERPRISES?

19 A. NOW, WHEN YOU SAY WORKED FOR IT, WORLD INSTITUTE
20 OF SCIENTOLOGY ENTERPRISES IS A SEA ORG UNIT WITHIN
21 SCIENTOLOGY. SO THE PEOPLE WHO RUN W.I.S.E. ARE SEA ORG
22 PEOPLE, AND I DID KNOW SOME PEOPLE WHO WERE IN THE SEA ORG
23 UNIT WHICH OPERATED W.I.S.E.

24 ROGER -- ROGER BARNS, I KNEW. HE WAS THE HEAD OF
25 W.I.S.E. FOR A PERIOD OF TIME.

26 Q. DO YOU KNOW WHO HAS BEEN INVOLVED WITH W.I.S.E.

1 SINCE YOU LEFT?

2 A. NO.

3 Q. OTHER THAN ROGER BARNS, DO YOU KNOW ANYONE ELSE
4 PERSONALLY THAT HAS WORKED FOR THE W.I.S.E. ORGANIZATION?

5 A. I MAY, BUT I DON'T KNOW OF THEM RIGHT NOW.

6 Q. DO YOU KNOW ANYBODY WHO HAS WORKED WITH OR FOR
7 SMITH AND ASSOCIATES?

8 A. NO, ALTHOUGH MIKE SMITH -- IT'S VERY POSSIBLE
9 THAT HE IS ONE OF TWO MIKE SMITHS THAT I KNOW FROM
10 SCIENTOLOGY. AND I KNEW -- AS I SAY, I KNEW TWO OF THEM,
11 AND I BELIEVE HE IS ONE OF THE TWO.

12 Q. DESCRIBE THE TWO MIKE SMITHS YOU KNOW.

13 A. ONE IS SHORTER AND DARK. AND ONE IS TALLER AND
14 FAIRER. AND I BELIEVE THAT THIS IS THE SHORTER AND DARKER
15 OF THE TWO.

16 Q. WHERE DID YOU MEET HIM?

17 A. IN LOS ANGELES.

18 Q. IN WHAT CONTEXT?

19 A. IN CONNECTION WITH MY WORK ON THE HUBBARD
20 BIOGRAPHY, IN ABOUT 1980.

21 Q. WHAT REASON DID YOU HAVE TO TALK TO HIM?

22 A. I BELIEVE THAT I CONTACTED HIM IN CONNECTION WITH
23 THE HUBBARD BIOGRAPHY, TO ARRANGE AN INTERVIEW. AND IT MAY
24 HAVE BEEN BECAUSE HE WAS CONNECTED TO SOMEONE ELSE THAT I
25 WANTED TO GET TO, TO INTERVIEW, BUT I DID TALK WITH THIS
26 MIKE SMITH ABOUT THE HUBBARD BIOGRAPHY PROJECT AT THAT TIME.

1 Q. DO YOU KNOW WHAT HIS POSITION WAS AT THE TIME?

2 A. I DON'T BELIEVE HE WAS ON STAFF. I THINK THAT HE
3 WAS A FIELD PERSON DOING SOMETHING LIKE THIS AT THAT TIME.

4 Q. LIKE WHAT?

5 A. CONSULTING, MANAGEMENT CONSULTING.

6 Q. DID YOU FOLLOW HIS CAREER AT ALL SINCE THE TIME
7 YOU MET HIM IN 1980?

8 A. NO.

9 Q. DO YOU KNOW ANYTHING ABOUT SMITH AND ASSOCIATES?

10 A. UM-UM.

11 Q. AND THE OTHER MIKE SMITH, THE TALLER AND FAIRER
12 ONE, WHEN DID YOU MEET HIM?

13 A. IN 1980.

14 Q. WHAT WAS HIS POSITION?

15 A. HE HAD SOMETHING TO DO WITH L. RON HUBBARD
16 ACCOUNTS. THERE WAS A POST CALLED L. RON HUBBARD ACCOUNTS,
17 AND THERE WAS A SEA ORG POST THAT TOOK CARE OF HUBBARD'S
18 PERSONAL ACCOUNTS.

19 Q. AND YOU BELIEVE THAT THE MIKE SMITH --

20 A. MY -- JUST A GUESS. I DON'T KNOW. IT COULD BE
21 NEITHER OF THEM, BUT I KNEW TWO.

22 Q. OKAY, HAVE YOU EVER MET INGRID GUDENAS?

23 A. I DON'T BELIEVE SO.

24 Q. DO YOU KNOW ANYTHING ABOUT INGRID GUDENAS?

25 A. I HAVE HEARD THAT SHE, I BELIEVE, RUNS APPLIED
26 SCHOLASTICS OUT OF AN OFFICE IN FREMONT.

1 Q. DO YOU KNOW ANYTHING BEYOND THAT?

2 A. NO.

3 Q. DO YOU KNOW ANYTHING ABOUT THE ORGANIZATION
4 CALLED APPLIED SCHOLASTICS OTHER THAN WHAT YOU'VE TESTIFIED?

5 A. NO.

6 Q. I'M SORRY?

7 A. NO, NOT OTHER THAN WHAT I'VE TESTIFIED ABOUT.

8 Q. DO YOU KNOW WHETHER APPLIED SCHOLASTICS PAYS ANY
9 MONEY TO THE CHURCH OR VICE VERSA?

10 A. I DON'T HAVE THAT PERSONAL KNOWLEDGE. I HAD AN
11 UNDERSTANDING BY THE TIME I LEFT THAT ROYALTIES WERE
12 BEING -- THAT WAS W.I.S.E.'S FUNCTION.

13 Q. WHAT WAS W.I.S.E.'S FUNCTION?

14 A. BOTH THE OVERSEEING OF THE APPLICATION OF
15 SCIENTOLOGY TECHNOLOGY IN OTHER AREAS; THAT IS, BUSINESS,
16 EDUCATION, AND THE OBTAINING, BILLING AND COLLECTING
17 ROYALTIES. BUT THAT WAS JUST KNOWLEDGE WHICH I HAD AT THE
18 TIME I WAS LEAVING AND WHEN W.I.S.E. WAS BEING ESTABLISHED.

19 Q. AND DO YOU KNOW WHAT THE CONNECTION BETWEEN
20 W.I.S.E. AND APPLIED SCHOLASTICS IS, IF ANY? ARE YOU SAYING
21 THERE'S A CONNECTION? BECAUSE I HAD STARTED BY ASKING YOU
22 ABOUT APPLIED SCHOLASTICS AND YOU ANSWERED ABOUT W.I.S.E.

23 SO ARE YOU SAYING THERE'S A CONNECTION?

24 A. I'M SORRY, I THOUGHT YOU ASKED ABOUT W.I.S.E.

25 Q. NO, I ASKED ABOUT APPLIED SCHOLASTICS.

26 A. OKAY, SO --

1 MR. ELSTEAD: WHAT'S THE QUESTION?

2 THE WITNESS: I --

3 MR. ELSTEAD: WAIT A MINUTE.

4 MS. REMMERS: I WANT TO SEE IF HE WANTS TO
5 CORRECT HIS RESPONSE.

6 MR. ELSTEAD: TO WHAT?

7 BY MS. REMMERS: Q. I STARTED BY ASKING YOU IF
8 YOU KNEW ANYTHING ABOUT APPLIED SCHOLASTICS BEYOND WHAT YOU
9 TESTIFIED TO, AND YOU SAID NO.

10 IS THAT STILL CORRECT?

11 A. RIGHT, THEN I THOUGHT YOU ASKED ABOUT W.I.S.E.

12 Q. NO, I DIDN'T ASK ABOUT W.I.S.E. NEXT.

13 A. OKAY.

14 Q. I ASKED YOU WHETHER YOU KNEW WHETHER THE CHURCH
15 HAD CONTRIBUTED ANY MONEY TO APPLIED SCHOLASTICS OR VICE
16 VERSA, AND THAT'S WHEN YOU ANSWERED THAT WAY.

17 A. I DON'T KNOW WHAT THEIR FINANCIAL RELATIONSHIP
18 IS.

19 Q. OKAY. DO YOU KNOW WHAT THE FINANCIAL
20 ARRANGEMENT, IF ANY, IS WITH W.I.S.E.?

21 A. I DON'T KNOW WHAT THE RELATIONSHIP IS WITH ANY OF
22 THEM IN PRESENT TIME.

23 AND ALL I KNEW ABOUT, WHEN I WAS LEAVING THE
24 ORGANIZATION, AROUND THAT TIME, BECAUSE THAT IS WHEN
25 W.I.S.E. WAS ESTABLISHED, WAS THAT IT WAS SET UP, HEADED BY
26 SEA ORG MEMBERS.

1 SEA ORG MEMBERS ARE SCIENTOLOGY STAFFERS WHO HAVE
2 TAKEN A BILL -- A YEAR CONTRACT; AND THAT W.I.S.E. WAS SET
3 UP TO SUPERVISE THE APPLICATION OF SCIENTOLOGY TECHNOLOGY IN
4 BUSINESS OR OTHER FIELDS SUCH AS EDUCATION; AND THAT THEY
5 DERIVED A ROYALTY FROM BUSINESSES WHICH APPLIED SCIENTOLOGY,
6 ADMINISTRATIVE OR OTHER, TECHNOLOGY..

7 Q. SO THEY RAN LIKE -- CORRECT ME IF I'M WRONG --
8 LIKE A LICENSING ORGANIZATION SO THAT PEOPLE COULD BUY THE
9 RIGHT TO DISSEMINATE HUBBARD TECHNOLOGY; IS THAT RIGHT?

10 A. I -- THOSE ARE YOUR WORDS, AND I HESITATE TO SAY
11 ANYTHING ABOUT IT BEYOND WHAT I KNEW AT THE TIME. AND I
12 UNDERSTOOD AT THE TIME -- I WAS NOT DIRECTLY INVOLVED IN IT
13 MYSELF, IN APPLIED SCHOLASTICS OR W.I.S.E. I DID NOT WORK
14 IN EITHER OF THOSE UNITS.

15 Q. NOW, YOU SAID THAT YOU MET WITH MR. ELSTEAD ON
16 SUNDAY, THE 23RD, WHICH IS TWO DAYS AFTER YOU MET WITH
17 MR. RUMMONDS?

18 A. RIGHT.

19 Q. HOW LONG DID YOU MEET WITH MR. ELSTEAD?

20 A. PERHAPS AN HOUR. PERHAPS HALF-AN-HOUR.

21 Q. WHERE WAS THAT?

22 A. IN A COFFEE SHOP IN BERKELEY.

23 Q. WAS ANYONE ELSE PRESENT?

24 A. NO.

25 Q. AND CAN YOU TELL ME WHAT YOU TWO TALKED ABOUT?

26 A. WE HAD A COUPLE OF PIECES OF BUSINESS, SOME OF

1 WHICH DOES NOT INVOLVE THIS CASE AND I WILL NOT GET INTO
2 THAT.

3 BUT INVOLVING THIS CASE, I TOLD HIM ABOUT MY
4 MEETING WITH JIM RUMMONDS. I TOLD HIM OF MY ASSESSMENT OF
5 THE CASE AT THAT TIME. I STATED THAT IN MY VIEW, FROM WHAT
6 I HAD SEEN, THAT SCIENTOLOGY WAS INVOLVED, AND THAT THE WAY
7 THE PLAINTIFFS APPEARED TO HAVE BEEN TREATED WAS CONSISTENT
8 WITH SCIENTOLOGY DEALINGS.

9 Q. SO WHEN YOU SAY YOU TOLD MR. ELSTEAD THAT
10 SCIENTOLOGY WAS INVOLVED, WHAT DO YOU MEAN BY THAT?
11 INVOLVED IN WHAT WAY?

12 A. THAT APPLIED SCHOLASTICS WAS A -- SIMPLY A
13 RESTATEMENT OF SCIENTOLOGY PROCEDURES AND PRACTICES.

14 Q. WERE YOU OPINING THAT YOU FELT THAT ANYONE AT
15 APPLIED MATERIALS WAS A SCIENTOLOGIST THAT WAS ACTING
16 AGAINST PLAINTIFFS HERE? WAS THAT THE OPINION YOU EXPRESSED
17 TO MR. ELSTEAD?

18 A. AT THAT TIME I DID NOT KNOW, AND I STILL DO NOT
19 KNOW WHO EXACTLY THE SCIENTOLOGISTS ARE WHO ARE INVOLVED.

20 Q. HAVE YOU EVER MET A SCIENTOLOGIST THAT YOU KNOW
21 TO WORK AT APPLIED MATERIALS?

22 A. NO.

23 Q. BUT IS IT PART OF YOUR OPINION THAT THERE ARE
24 EMPLOYEES AT APPLIED MATERIALS WHO ARE SCIENTOLOGISTS AND
25 WHO HAVE TAKEN ADVERSE ACTIONS AGAINST THE PLAINTIFFS IN
26 THIS CASE?

1 A. ONLY THAT THE WAY THEY WERE DEALT WITH IS
2 CONSISTENT WITH THE WAY SCIENTOLOGY DEALS WITH WHAT IT
3 PERCEIVES ARE ITS CRITICS.

4 Q. WHAT IS THAT?

5 A. AND THE SECOND PART OF THAT IS THAT
6 SCIENTOLOGISTS OFTEN AGREE TO NOT ADMIT TO THEIR CONNECTION
7 TO THE SCIENTOLOGY ORGANIZATION, TO ASSUME VARIOUS COVERS,
8 AND TO OBSTRUCT JUSTICE; THAT IS, TO DENY INVOLVEMENT OR TO
9 TESTIFY FALSELY AS TO FACTS OR LINES OF CONTROL.

10 Q. SO IS IT YOUR OPINION IN THIS CASE, BASED ON YOUR
11 REVIEW OF THE MATERIALS YOU'VE BEEN PROVIDED SO FAR AND YOUR
12 DISCUSSIONS WITH COUNSEL AND PLAINTIFFS, THAT THERE ARE
13 EMPLOYEES AT APPLIED MATERIALS THAT ARE SCIENTOLOGISTS THAT
14 ARE DENYING THAT THEY ARE SCIENTOLOGISTS?

15 A. NO, BUT IF THAT WERE THE CASE, THAT IS CONSISTENT
16 WITH THE PRACTICES OF SCIENTOLOGY.

17 Q. WHAT ELSE DO YOU RECALL ABOUT YOUR DISCUSSION
18 WITH MR. ELSTEAD ON THE 23RD?

19 MR. ELSTEAD: REGARDING THIS CASE?

20 BY MS. REMMERS: Q. RIGHT.

21 A. I TOLD HIM -- I THINK WE WENT OVER SCHEDULING AT
22 THAT TIME, THAT MY DEPOSITION WAS GOING AHEAD AND AGREED TO
23 ON A CERTAIN DATE. I ASKED FOR HIS PERMISSION TO TALK TO
24 HIS CLIENTS. I DID THAT WITH MR. RUMMONDS AS WELL. THAT'S
25 ANOTHER THING, BECAUSE I WANTED TO DO THAT IN ORDER TO GET
26 THEIR STATEMENTS.

1 AND SO HE -- HE AGREED THAT I COULD AT THAT TIME,
2 AND HE MAY HAVE GIVEN ME THE -- A WAY OF CONTACTING THEM
3 THEN, BUT I THINK HE CALLED ME BACK A DAY OR TWO LATER.

4 Q. NOW, DID MR. ELSTEAD TELL YOU WHAT HE WANTED YOU
5 TO TESTIFY ABOUT ON BEHALF OF HIS CLIENTS?

6 A. MY RECOLLECTION IS THAT I PRESENTED TO HIM HOW I
7 CONSIDERED THAT MY KNOWLEDGE AND MY AREA OF EXPERTISE FIT
8 INTO WHAT I THEN KNEW OF THE CASE.

9 Q. AND HAVE YOU TOLD ME WHAT YOU TOLD HIM, IN THAT
10 MEETING?

11 A. PRINCIPALLY, I THINK YOU GET THE PICTURE OF WHERE
12 I'M COMING FROM, AND WHAT I KNOW, AND WHAT OPINION I FORMED
13 REGARDING THIS CASE.

14 Q. HAVE YOU TOLD ME EVERY OPINION YOU NOW HOLD . . .

15 A. OH, I DON'T KNOW.

16 Q. . . . ABOUT THIS CASE?

17 WELL, THAT'S WHAT WE'RE HERE TO DO.

18 A. WELL, YOU CAN SET UP SITUATIONS AND ASK MY
19 OPINION. THERE ISN'T ANYTHING THAT I'M WITHHOLDING ABOUT AN
20 OPINION BUT --

21 Q. WELL, HAVE YOU FORMED ANY OTHER OPINIONS THAT YOU
22 BELIEVE YOU ARE QUALIFIED TO TESTIFY ABOUT IN THIS CASE,
23 OTHER THAN WHAT YOU'VE ALREADY TESTIFIED TO UNDER OATH?

24 A. NOTHING COMES TO MIND.

25 Q. NOW, DID YOU THEN GO AHEAD AND TALK TO THE
26 PLAINTIFFS? YOU SAID --

1 A. YES.

2 Q. AND WHO DID YOU TALK TO?

3 A. I CALLED KATE SCHUCHMANN.

4 Q. UH-HUH.

5 A. AND I CALLED VIRGINIA. AND THEN FROM MY
6 CONVERSATION WITH VIRGINIA CAME A MEETING WITH HER AND
7 STEVEN HUNZIKER.

8 Q. SO HOW LONG DID YOU TALK WITH KATE SCHUCHMANN?

9 A. OH, JUST VERY BRIEFLY TO MAKE ARRANGEMENTS TO
10 CALL HER AT ANOTHER TIME.

11 Q. SO HOW LONG APPROXIMATELY?

12 A. A COUPLE MINUTES.

13 Q. AND THEN DID YOU CALL HER AGAIN?

14 A. THEN I SPOKE TO HER YESTERDAY.

15 Q. ON THE TELEPHONE?

16 A. I HAD -- IT HAD BEEN MY DESIRE TO SPEAK TO HER
17 BEFORE THIS DEPOSITION, BUT WE JUST COULD NOT COORDINATE
18 GETTING TOGETHER.

19 Q. SO YOU SPOKE WITH HER ON THE TELEPHONE YESTERDAY?

20 A. RIGHT. BUT AGAIN JUST TO SAY IT LOOKED LIKE WE
21 WOULDN'T GET TOGETHER, AND I'LL, IF AT ALL POSSIBLE, I WILL
22 MEET WITH HER.

23 Q. SO YOU'VE HAD TWO CONVERSATIONS WITH HER, BOTH
24 BRIEF?

25 A. RIGHT.

26 Q. DID SHE TELL YOU ANYTHING ABOUT THE FACTS AS SHE

1 KNOWS THEM IN THE CASE?

2 A. NO.

3 Q. WHAT ABOUT VIRGINIA SANDERS THEN? YOU MET WITH
4 VIRGINIA AND STEVEN HUNZIKER?

5 A. RIGHT.

6 Q. WHEN WAS THAT?

7 A. SATURDAY, THIS PAST SATURDAY.

8 Q. WHERE WAS THAT?

9 A. IN SUNNYVALE, OKAY.

10 Q. WHERE IN SUNNYVALE?

11 A. IN A HOTEL.

12 Q. WHAT HOTEL?

13 A. HILTON.

14 Q. WHO WAS PRESENT BESIDES YOU AND VIRGINIA SANDERS
15 AND STEVEN HUNZIKER?

16 A. NO ONE.

17 Q. HOW LONG DID YOU SPEND?

18 A. PERHAPS THREE HOURS.

19 Q. AND WHAT DID THEY TELL YOU? AND YOU CAN INCLUDE
20 IN THAT THE DISCUSSION THAT YOU HAD WITH VIRGINIA SANDERS BY
21 TELEPHONE, TOO, TO MAKE IT FASTER.

22 A. OKAY, THE TELEPHONE CONVERSATION WITH VIRGINIA
23 JUST CONCERNED GETTING TOGETHER AND A TIME AND LOCATION.

24 Q. OKAY.

25 A. AND THEN I MET WITH THEM.

26 Q. HAD YOU EVER TALKED TO ANY OF THE THREE

1 PLAINTIFFS BEFORE IN YOUR LIFE?

2 A. NO.

3 Q. OKAY. WHAT DO YOU RECALL BEING SAID IN THE
4 THREE-HOUR MEETING?

5 A. IT GENERALLY CONCERNED THEIR RECITATION OF WHAT
6 HAPPENED TO THEM.

7 Q. WHAT DID THEY TELL YOU HAPPENED TO THEM?

8 A. THAT THEY WERE BOTH EMPLOYED IN APPLIED
9 MATERIALS, I BELIEVE IN HUMAN RESOURCES, ONE OF THOSE
10 DEPARTMENTS, AND THAT I -- MY RECOLLECTION IS THAT KATE WAS
11 THE FIRST ONE, THAT KATE HAD BEEN INVOLVED AND HAD DONE A
12 COURSE PRIOR TO THEIR BECOMING INVOLVED, AND THAT NEITHER OF
13 THEM ACTUALLY DID A COURSE, BUT BLEW THE WHISTLE ON IT BEING
14 SCIEN TOLOGY BEFORE THE COURSE WAS EVER IMPLEMENTED OR DID
15 ANYTHING ABOUT IT.

16 VIRGINIA HAD BEEN BROUGHT TO A SCIEN TOLOGY -- I
17 THINK THE STEVENS CREEK SCIEN TOLOGY ORGANIZATION, AND HAD
18 BEEN -- HAD GONE THROUGH REALLY A METERED, WHAT I WOULD CALL
19 DFP INTERVIEW.

20 Q. WHAT'S THAT?

21 A. DIRECTOR OF PROCESSING.

22 WHICH IS AN INTERVIEW WHICH IS DONE EITHER AS AN
23 INTRODUCTORY ACTION, KIND OF TO GROOVE YOU IN ON SCIEN TOLOGY
24 PROCEDURES, OR AS A POINT WHICH IS REGULARLY DONE IN
25 AUDITING, WHERE, IN AN OFFICE SETTING, YOU ARE INTERVIEWED
26 BY THE DIRECTOR OF PROCESSING AS OPPOSED TO AUDITING BY AN

1 AUDITOR.

2 Q. NORMALLY, IN THE CHURCH OF SCIENTOLOGY, YOUR
3 FIRST INTRODUCTION TO SCIENTOLOGY WOULD NOT BE A TRUE
4 AUDITING SESSION, WOULD IT?

5 A. THERE ISN'T ANY ABSOLUTE NORM AS TO HOW -- HOW
6 ONE IS BROUGHT IN.

7 Q. THERE'S NO PROCEDURE?

8 A. LET ME JUST EXPLAIN. SOME PEOPLE ARE BROUGHT IN
9 WITH PERSONALITY TESTS. SOME PEOPLE READ A BOOK. SOME
10 PEOPLE ARE DISSEMINATED TO BY FRIENDS. SOME PEOPLE COULD BE
11 PUT ON THE METER AND ASKED QUESTIONS RIGHT AWAY.

12 IT REALLY IS A MATTER OF WHAT HAPPENED TO HER.
13 AND THE WAY SHE DESCRIBES IT IS AN INCIDENT WHERE SHE WAS
14 BROUGHT IN BY A FRIEND, WHO WAS AN EMPLOYEE AT APPLIED
15 MATERIALS, AND THEN LEFT WITH SOMEONE, AND ASKED QUESTIONS.

16 AND THEY WENT THROUGH, I BELIEVE, A WORD CLEARING
17 PROCEDURE AND A PROCEDURE CLEARING PROCEDURE; THAT IS, THIS
18 IS WHAT I AM DOING, AND I'M GOING TO ASK YOU THESE
19 QUESTIONS, AND CLEARING MEANING.

20 SO HER DESCRIPTION OF IT WAS QUITE CONSISTENT
21 WITH THE SCIENTOLOGY INTRODUCTION AUDITING EXPERIENCE.

22 Q. DID SHE SAY WHETHER SHE WAS ASKED TO READ
23 ANYTHING IN PARTICULAR?

24 A. SHE MAY HAVE MENTIONED WORDS THAT WAY. SHE MAY.
25 AND I DIDN'T GO INTO IT IN ANY GREAT DETAIL WITH HER.

26 Q. THAT SHE WAS ASKED TO READ WORDS?

1 A. THAT'S MY RECOLLECTION, THAT THEY CLEARED SOME
2 WORDS, WHICH IS STANDARD PROCEDURE. BEFORE YOU GIVE SOMEONE
3 A COMMAND OR BEFORE YOU ASK THEM A QUESTION, YOU CLEAR THE
4 WORDS. AND THAT IS DONE IN AN AUDITING SETTING LIKE THAT ON
5 THE METER.

6 Q. DID SHE TELL YOU ABOUT ANYTHING ELSE THAT
7 HAPPENED TO HER?

8 A. I BELIEVE THAT SHE -- SHE AT SOME POINT SAID THAT
9 THAT'S ENOUGH, AND SHE HAD FELT LIKE, I GUESS, A LITTLE BIT
10 LIKE HER APPLIED MATERIALS FRIEND HAD SKIPPED ON HER AND
11 LEFT HER THERE HOLDING THE CANS. AND SHE ARRIVED AT A POINT
12 WHERE SHE SAID ENOUGH AND --

13 OH, THEN I THINK SHE WAS LOCKED IN THE ROOM FOR A
14 PERIOD OF 45 MINUTES OR SOMETHING, WHILE SOMEBODY WENT OFF
15 TO -- AND MAYBE SHE WAS BEING A PROBLEM, BUT I DIDN'T GET
16 INTO IT. SHE DIDN'T SEEM LIKE SHE WAS THAT KIND OF A PERSON
17 BUT IF --

18 Q. WAS THIS AN AUDITING SESSION SHE WAS DESCRIBING,
19 WHAT YOU WOULD CALL AUDITING?

20 A. WELL, IN THAT IT WAS ON -- IT WAS METERED. SO
21 SHE WAS BEING ASKED QUESTIONS AND SHE WAS HOLDING ON TO THE
22 SOUP CANS, THE ELECTRODES. SO IT'S AUDITING IN THAT SENSE.

23 NOW IT MAY HAVE BEEN DONE BY SOMEONE WHO WAS
24 WEARING THE HAT OF DFP, OR WEARING A HAT OF REGISTRAR, OR
25 SOMETHING ELSE, SOME INTRODUCTORY PERSON WHO WAS DOING
26 SOMETHING TO GET HER TO A POINT OF AGREEING TO BECOME

1 INVOLVED WITH SCIENTOLOGY, TAKE A COURSE OR READ A BOOK OR
2 SOMETHING.

3 Q. IN YOUR EXPERIENCE WOULD THAT BE TYPICAL TO HAVE
4 SOMEONE LOCKED IN A ROOM, PHYSICALLY UNABLE TO LEAVE FOR 45
5 MINUTES AFTER A SESSION?

6 A. IT'S NOT TYPICAL.

7 Q. HAVE YOU EVER SEEN THAT DONE?

8 A. WELL, I'VE SEEN OTHER PEOPLE LOCKED UP.

9 Q. LIKE THE DESCRIPTION YOU GAVE OF WHEN YOU WERE
10 PUT IN THAT UNIT; IS THAT WHAT YOU'RE TALKING ABOUT?

11 A. YEAH, BUT I'VE SEEN PEOPLE LOCKED UP WHEN THEY
12 BEGAN TO FREAK OUT.

13 Q. YOU MEAN FOR THEIR OWN PROTECTION?

14 A. WELL, IT GENERALLY -- IT WASN'T REALLY FOR THEIR
15 OWN PROTECTION. IT WAS SO THEY DIDN'T CREATE A FLAK WHICH
16 WOULD BE EMBARRASSING FOR THE ORGANIZATION OR CAUSE THE
17 ORGANIZATION SOME KIND OF LEGAL TROUBLE DOWN THE ROAD.

18 Q. HAVE YOU EVER SEEN ANYONE WHO HAS NEVER BEEN
19 INTRODUCED TO SCIENTOLOGY BEFORE, BUT IS A RECRUIT, BEING
20 LOCKED UP ON THE FIRST SESSION FOR 45 MINUTES, POUNDING ON A
21 DOOR AND NOT BEING LET OUT, EVER, IN YOUR EXPERIENCE?

22 A. NO, BUT AGAIN I HAVE SEEN PEOPLE POUNDING ON
23 DOORS. IN FACT, NOT JUST FOR 45 MINUTES BUT FOR DAYS, AND
24 NOT BEING LET OUT.

25 Q. OKAY, WHAT ELSE DO YOU RECALL THE PLAINTIFFS
26 TELLING YOU?

1 Q. WHO VERBALLY ABUSED HIM?

2 A. THE NAME LINDA OXMAN COMES TO MIND. GLEN TONEY
3 MAY HAVE PARTICIPATED IN THAT. BUT THE CHARACTER
4 ASSASSINATION THAT APPEARS TO HAVE GONE ON -- HE SHOWED ME A
5 LIST OF THINGS WHICH HAVE BEEN -- ACCUSATIONS WHICH HAVE
6 BEEN MADE ABOUT HIM.

7 Q. LIKE WHAT?

8 A. THEY TENDED TO BE BROAD GENERALITIES WITHOUT ANY
9 SPECIFICS, AND THAT WAS THE WAY HE DESCRIBED IT AS WELL, THE
10 WAY HE WAS DEALT WITH, WITH INNUENDO.

11 Q. WHAT ELSE DO YOU RECALL HIM TELLING YOU?

12 A. AND THAT THROUGH THAT -- I THINK THAT THIS WENT
13 ON FROM OCTOBER THROUGH FEBRUARY PERHAPS OF THE NEXT YEAR,
14 AND THAT DURING THAT TIME HE CONTINUED ON. HE SAID THAT
15 WORK WAS HEAPED ON HIM, AND HIS PERFORMANCE WAS -- IT JUST
16 COULDN'T BE GOOD ENOUGH BUT HE WAS BEING LANDED WITH MORE
17 WORK THAN HE COULD POSSIBLY DO.

18 Q. HE TOLD YOU THAT?

19 A. (WITNESS NODS HEAD)

20 Q. DID HE DESCRIBE FOR YOU WHAT WORK HE WAS UNABLE
21 TO DO?

22 A. I DON'T THINK I ASKED THE QUESTION.

23 Q. DID HE DESCRIBE WHAT KIND OF WORK WAS BEING
24 HEAPED ON HIM?

25 A. I THINK TRAINING PEOPLE.

26 Q. ANYTHING ELSE?

1 A. THAT'S WHAT COMES TO MIND.

2 Q. CAN YOU RECALL ANYTHING ELSE HE TOLD YOU ABOUT
3 HIS TREATMENT AFTER HE COMPLAINED?

4 A. THE GIST OF WHAT IT WAS WAS THAT THERE WAS A
5 COMPLETE TURN AROUND, AND FROM BEING ON ONE DAY A FULLY
6 FUNCTIONING, ACCEPTED MEMBER OF THE GROUP, HE WAS ON THE
7 OUTS, AND HIS VIEWS AND HIS WORKS WERE THEREAFTER DENIGRATED
8 UNIFORMLY.

9 Q. BY WHOM?

10 A. HIS SENIORS.

11 Q. DID HE TELL YOU WHO?

12 A. LINDA OXMAN, AND THERE MAY BE SOMEONE ELSE
13 INVOLVED. I THINK SHE'S THE MAIN, THE MAIN ONE AS FAR AS HE
14 KNOWS. GLEN TONEY'S NAME --

15 Q. DID HE TELL YOU WHETHER HE HAD REASON TO BELIEVE
16 LINDA OXMAN AND/OR GLEN TONEY WAS A SCIENTOLOGIST?

17 A. REASON TO BELIEVE, YES. PROOF THAT THEY WERE,
18 NO.

19 Q. WHAT WAS HIS REASON TO BELIEVE THAT THEY WERE?

20 A. BECAUSE THEY -- THEY APPEARED TO BACK UP AND BE
21 UNWILLING TO TAKE ANY KIND OF EITHER CRITICAL OR, IN HIS
22 MIND, EVEN A SENSIBLE VIEW OF WHAT THEY WERE BEING ASKED TO
23 DO.

24 AND THE IMPLEMENTATION OF SCIENTOLOGY PROCEDURES
25 AND POLICIES WITHIN APPLIED MATERIALS -- HE HAD A CONCEPT
26 WHERE HIS PERFORMANCE IS RATED ON HIS ABILITY TO, AFTER

1 BEING TRAINED ON THIS MATERIAL HIMSELF, TO HAVING TO TRAIN
2 OTHERS ON IT, TO BECOME A TRAINER IN SCIENTOLOGY MATERIAL,
3 IN THAT SORT OF COVERT MANNER, AND THAT HIS PERFORMANCE
4 WOULD THEN BE RATED ON HIS ABILITY TO GET OTHER PEOPLE
5 TRAINED ACCORDING TO SCIENTOLOGY'S RULES.

6 Q. DID HE TELL YOU THAT THAT WAS THE PLAN, THAT HE
7 WAS GOING TO BE ASKED TO TEACH THE COURSE THAT HE WAS GOING
8 TO TAKE THAT WAS HUBBARD BASED?

9 A. THAT WAS MY UNDERSTANDING, THAT IT WOULD BE --
10 THAT HIS JOB PERFORMANCE DOWN THE LINE WOULD BE BASED ON
11 THAT.

12 Q. DID HE TELL YOU HE WAS TOLD THAT BY HIS
13 SUPERIORS?

14 A. I DON'T RECALL THAT.

15 Q. DO YOU RECALL WHAT COURSE HE WAS OBJECTING TO
16 TAKING, HE WAS ASKED TO TAKE AND OBJECTED TO?

17 A. HE DEFINITELY TOLD ME, AND YOU MAY HAVE IT THERE.

18 Q. DID HE TELL YOU THAT IT WAS THE KEY TO EFFECTIVE
19 TRAINING?

20 A. THAT'S THE ONE THAT'S GOT THE THREE BASKET SYSTEM
21 IN IT?

22 Q. NO, THAT'S TIME MANAGEMENT.

23 A. OKAY.

24 Q. LET ME ASK YOU IF YOU HAVE EVER SEEN THESE
25 MATERIALS. AND WHAT IT SAYS IS, "APPLIED SCHOLASTICS
26 INTERNATIONAL, EXHIBIT D, PAGE 1, KEY TO EFFECTIVE

1 COMPREHENSION," AND THEN THERE ARE MANY PAGES THAT FOLLOW,
2 INCLUDING A BOOKLET, "THE ART OF LISTENING AND
3 COMMUNICATING."

4 LET ME ASK YOU IF YOU'VE SEEN THAT BEFORE THEY
5 WERE GIVEN TO YOU BY MR. RUMMONDS?

6 A. NO, NOT IN THIS FORM.

7 Q. HAVE YOU SEEN IT IN ANY FORM?

8 A. YEAH, THESE --

9 Q. WHEN HAD YOU SEEN THAT BEFORE YOU LEFT THE
10 CHURCH? LET ME ASK YOU THAT.

11 DID YOU EVER SEE IT BEFORE YOU LEFT THE CHURCH?

12 A. MUCH OF IT.

13 Q. OKAY. BUT NOT IN THAT FORM?

14 A. RIGHT.

15 Q. IS THIS LIKE THE OTHER, A SIMPLIFIED VERSION OF
16 WHAT YOU HAD SEEN?

17 A. RESTRUCTURED. SO MUCH OF THE LANGUAGE IS THE
18 SAME, IS HUBBARD'S LANGUAGE.

19 Q. IS THIS A COURSE THAT YOU HAD EVER TAKEN?

20 A. I HAD TAKEN WHAT'S CALLED IN SCIENTOLOGY THE
21 STUDENT HAT OR THE STUDY COURSE. SO I HAD DONE THESE, READ
22 AND STUDIED MANY OF THESE, MISUNDERSTOOD WORDS AND CYCLES OF
23 ACTION.

24 Q. WHAT ELSE DO YOU RECALL STEVEN HUNZIKER TELLING
25 YOU ABOUT HIS TREATMENT? DID HE TELL YOU HE QUIT?

26 A. YES.

1 Q. DID HE TELL YOU THAT HE HAD TALKED TO FORD GREENE
2 A NUMBER OF TIMES BEFORE HE QUIT?

3 A. I DON'T RECALL THAT.

4 Q. DID HE TELL YOU THAT RIGHT AFTER HE COMPLAINED TO
5 THE COMPANY, THE COMPANY DECIDED NOT TO OFFER ANY COURSES
6 EVER AGAIN THAT WERE AUTHORED BY L. RON HUBBARD?

7 A. THERE -- I BELIEVE THAT WHAT HE SAID, AND I THINK
8 THAT THERE'S A DOCUMENT HERE, INCLUDED IN THIS GROUP OF
9 MATERIALS WHICH I BROUGHT, WHICH STATED THAT THE DECISION
10 WOULD BE MADE BY -- IS IT EDD?

11 Q. YOU TELL ME.

12 A. WOULD BE MADE BY THAT, THAT UNIT IN APPLIED
13 MATERIALS, WITH REGARDS TO FUTURE COURSES TO BE GIVEN WITHIN
14 THE COMPANY.

15 Q. DO YOU HAVE ANY IDEA WHETHER THE COMPANY HAS EVER
16 TAUGHT ANYTHING BY L. RON HUBBARD SINCE MR. HUNZIKER
17 COMPLAINED?

18 A. OH, NO INFORMATION.

19 Q. DO YOU RECALL ANYTHING ELSE STEVEN HUNZIKER TOLD
20 YOU ABOUT HIS TREATMENT AFTER HE COMPLAINED?

21 A. NOTHING COMES TO MIND.

22 Q. WHAT DO YOU RECALL, IF ANYTHING, THAT VIRGINIA
23 SANDERS TOLD YOU ABOUT HER TREATMENT, ONCE SHE LEFT -- OR
24 ONCE SHE COMPLAINED? OR DID SHE TELL YOU THAT SHE
25 COMPLAINED?

26 A. YEAH. YEAH, SHE TOLD ME THAT SHE ALSO

1 PARTICIPATED IN THE -- OR WAS A RECIPIENT OF THE VERBAL
2 ABUSE, THE HARANGUES FROM THEIR SENIORS.

3 Q. DO YOU REMEMBER WHO SHE SAID VERBALLY ABUSED HER?

4 A. MY RECOLLECTION WAS LINDA OXMAN.

5 Q. DO YOU RECALL ANYTHING ELSE THAT VIRGINIA SANDERS
6 SAID ABOUT HER TREATMENT?

7 A. THE IDEA THAT THEY CONVEYED WAS THAT THEY WERE --
8 THAT SHE WENT FROM BEING AN ACCEPTABLE, FUNCTIONING PART OF
9 THE COMPANY, TO A FEELING THAT SHE WAS BEING OSTRASIZED AND
10 HER WORK PRODUCT UNACCEPTABLE.

11 Q. DID SHE LEAD YOU TO BELIEVE THAT HER WORK PRODUCT
12 HAD NEVER BEEN CHALLENGED BEFORE SHE MADE AN OBJECTION TO
13 THE HUBBARD BASED COURSE?

14 MR. ELSTEAD: OBJECTION. AMBIGUOUS.

15 THE WITNESS: MY RECOLLECTION IS THAT UP TO THAT
16 TIME, SHE WAS DOING FINE, AND WAS -- SHE DID NOT SAY
17 ANYTHING ABOUT PRIOR COMPLAINTS.

18 BY MS. REMMERS: Q. DID SHE TELL YOU ANYTHING
19 ELSE OTHER THAN THIS VERBAL ABUSE AND A FEELING OF BEING
20 OSTRASIZED THAT HAPPENED TO HER AFTER SHE COMPLAINED?

21 A. I -- YOU KNOW, THE PICTURE I GOT WAS THAT IT WENT
22 ON FOR A LONG PERIOD OF TIME.

23 Q. HOW LONG WITH VIRGINIA SANDERS?

24 A. SOME MONTHS.

25 Q. DO YOU KNOW WHEN SHE LEFT THE COMPANY?

26 A. I DON'T RECALL RIGHT NOW. SHE PROBABLY SAID,

1 THOUGH.

2 Q. SHE TOLD YOU SHE QUIT; RIGHT?

3 A. I BELIEVE SO, YEAH.

4 Q. DID EITHER OF THEM TELL YOU THAT BEFORE THEY
5 QUIT, THEY MET WITH MARGARET SINGER?

6 A. I DON'T RECALL THAT.

7 Q. DO YOU RECALL ANYTHING ELSE VIRGINIA SANDERS OR
8 STEVEN HUNZIKER TOLD YOU IN YOUR MEETING?

9 A. AGAIN, WE WENT -- I WENT OVER WHAT I KNEW OF THE
10 MATERIALS AT THAT TIME AND ASKED THEM SOME QUESTIONS ABOUT
11 WHICH WAS WHICH, AND I CAME AWAY -- AND I CONVEYED THAT
12 OPINION TO THEM, THAT THIS WAS INDEED SCIENTOLOGY, AND THAT
13 I HAD PARTICIPATED MYSELF IN THE ORGANIZATION IN THIS TYPE
14 OF TRAINING, AND THAT I -- THAT MY PART IN THIS HAD TO DO
15 WITH WHAT HAPPENS TO A PERSON WHO IS CRITICAL OF HUBBARD IN
16 THE ORGANIZATION AND THE EXTREMES TO WHICH THE ORGANIZATION
17 WILL GO.

18 Q. SO FROM YOUR DISCUSSIONS WITH THE TWO PLAINTIFFS
19 AND THE MATERIALS THAT YOU'VE GIVEN US COPIES OF TODAY, DID
20 YOU USE THAT INFORMATION TO FORM AN OPINION ABOUT WHETHER
21 THE CHURCH OF SCIENTOLOGY HAS IN SOME WAY ACTED AGAINST THE
22 PLAINTIFFS IN THIS CASE OR MEMBERS OF THE CHURCH?

23 A. I HAVE NOT MADE THAT STATEMENT, NOR HAVE I
24 FORMED --

25 Q. AN OPINION?

26 A. NO, I HAVE NOT FORMED AN OPINION IN THAT REGARD.

1 ONLY TO THE EXTENT THAT WHAT HAPPENED IS CONSISTENT WITH THE
2 WAY SCIENTOLOGY DEALS WITH ITS PROBLEMS, AND THE FACT WAS
3 THAT SCIENTOLOGISTS, A SCIENTOLOGIST OR SCIENTOLOGISTS WERE
4 BEHIND THE ATTEMPT TO IMPLEMENT SCIENTOLOGY IN THE APPLIED
5 MATERIALS WORKPLACE.

6 Q. YOU FORMED THAT OPINION?

7 A. RIGHT, IT'S MY UNDERSTANDING --

8 Q. ON THE BASIS OF WHAT? YOUR DISCUSSIONS WITH THE
9 PLAINTIFFS?

10 A. AND THE READING OF THIS MATERIAL, AND THE
11 KNOWLEDGE THAT THE COURSES WERE BEING GIVEN BY APPLIED
12 SCHOLASTICS, WHICH IS A SCIENTOLOGY FRONT GROUP.

13 Q. WHEN YOU SAY SCIENTOLOGY FRONT GROUP, WHAT DO YOU
14 MEAN?

15 A. IT IS UNDER THE CONTROL OF SCIENTOLOGISTS. IT IS
16 RUN BY SCIENTOLOGISTS.

17 Q. I THOUGHT YOU TESTIFIED EARLIER YOU DIDN'T KNOW
18 ANYTHING ABOUT THE STRUCTURE OF APPLIED SCHOLASTICS?

19 MR. ELSTEAD: THAT MISSTATES HIS PRIOR TESTIMONY.

20 BY MS. REMMERS: Q. SO WHEN YOU SAY "UNDER THE
21 CONTROL," WHAT DO YOU BASE THAT ON?

22 A. WHEN I WAS IN THE ORGANIZATION, APPLIED
23 SCHOLASTICS WAS UNDER THE CONTROL OF THE SOCIAL COORDINATION
24 BUREAU OF THE GUARDIAN'S OFFICE.

25 Q. DO YOU KNOW WHAT IT'S UNDER NOW, IF ANYTHING?

26 A. ORGANIZATIONALLY, I'M NOT EXACTLY SURE HOW THEY

1 STRUCTURE IT. BUT THERE IS WITHIN SCIENTOLOGY ONE
2 ORGANIZATION. IT HAS ONE LEADER. AND THAT LEADER CAN ORDER
3 ANYTHING TO BE DONE IN ANY FRINGE GROUP SUCH AS NARCANON,
4 APPLIED SCHOLASTICS, CRIMANON, WHICH ARE SCIENTOLOGY FRONT
5 GROUPS, THE PURPOSE OF WHICH IS TO GET SCIENTOLOGY ACCEPTED
6 IN VARIOUS CORNERS OF THE WORLD, IN BUSINESSES, IN
7 EDUCATION, ET CETERA.

8 Q. NOW, FROM THAT UNDERSTANDING, IS THAT CORRECT,
9 YOU HAVE CONCLUDED THAT YOU BELIEVE THAT THERE WERE
10 SCIENTOLOGISTS WITHIN APPLIED MATERIALS THAT WERE TRYING TO
11 CONVERT PEOPLE; IS THAT WHAT YOU'RE SAYING? AS OPPOSED TO
12 APPLIED SCHOLASTICS THAT WAS GIVING THE COURSE?

13 A. RIGHT.

14 Q. OKAY. ARE YOU SAYING --

15 A. WHAT WE KNOW IS THAT A SCIENTOLOGIST, ACCORDING
16 TO THE TESTIMONY OF VIRGINIA, WHO WAS WORKING IN APPLIED
17 MATERIALS, TOOK HER TO A SCIENTOLOGY FACILITY, SCIENTOLOGY
18 ORGANIZATION.

19 Q. MR. ARMSTRONG, DO YOU KNOW WHETHER THAT
20 INDIVIDUAL WAS EVEN IN THE COMPANY WHEN THIS COURSE WAS
21 BEING OFFERED AND THESE EVENTS OCCURRED TO VIRGINIA SANDERS?

22 A. NO.

23 Q. WOULD THAT CHANGE YOUR OPINION?

24 A. I HAVEN'T GIVEN YOU THE OPINION THAT YOU'RE
25 LOOKING FOR YET.

26 Q. OKAY.

1 A. I'M SAYING WHAT'S KNOWN -- IS IT GUDENAS? -- THE
2 HEAD OF APPLIED SCHOLASTICS IS A SCIENTOLOGIST. THAT
3 SCIENTOLOGIST WAS IMPLEMENTING SCIENTOLOGY COURSES IN
4 APPLIED MATERIALS.

5 Q. WAS OFFERING COURSES TO APPLIED MATERIALS
6 EMPLOYEES; IS THAT WHAT YOU MEAN?

7 A. AM I RIGHT IN SAYING THAT THERE WERE SOME 115 OR
8 SO APPLIED MATERIALS PERSONNEL WHO PASSED THROUGH APPLIED
9 SCHOLASTICS COURSES IN THE PERIOD OF SOME YEARS?

10 Q. IS THAT WHAT YOU WERE TOLD?

11 A. THAT'S MY RECOLLECTION.

12 Q. OKAY, LET'S ASSUME THAT THAT'S PART OF YOUR
13 HYPOTHESIS.

14 A. OKAY.

15 Q. DO YOU THEN CONCLUDE THAT BECAUSE APPLIED
16 MATERIALS PURCHASED COURSE WORK FROM APPLIED SCHOLASTICS,
17 THEREFORE THERE MUST HAVE BEEN SCIENTOLOGISTS WITHIN APPLIED
18 MATERIALS TRYING TO RECRUIT OTHER SCIENTOLOGISTS FROM WITHIN
19 THE ORGANIZATION?

20 A. NO, I'M NOT MAKING THAT CONCLUSION.

21 Q. SO AS FAR AS YOU KNOW, YOU DON'T KNOW ONE WAY OR
22 ANOTHER WHETHER THERE WERE SCIENTOLOGISTS WITHIN APPLIED
23 MATERIALS THAT WERE TRYING TO RECRUIT ONE WAY OR ANOTHER?

24 A. DON'T KNOW.

25 Q. SO LET ME SEE IF I CAN SUMMARIZE WHAT YOU EXPECT
26 TO TESTIFY ABOUT AS AN EXPERT HERE.. YOU EXPECT TO TESTIFY

1 THAT THE MATERIALS THAT YOU'VE BEEN SHOWN THAT WERE GIVEN BY
2 APPLIED SCHOLASTICS OR OTHER HUBBARD BASED MATERIALS WERE
3 SOME OF THE MATERIALS, WERE MATERIALS YOU SAW PERSONALLY IN
4 THE ORGANIZATION; CORRECT?

5 A. RIGHT.

6 Q. YOU ALSO EXPECT TO TESTIFY THAT THE
7 SCIENTOLOGISTS ARE VINDICTIVE AND HAVE A FAIR GAME POLICY
8 THAT CAN WORK TO PEOPLE'S DETRIMENT IF THEY COMPLAIN;
9 CORRECT?

10 A. RIGHT.

11 Q. AND YOU EXPECT TO TESTIFY ABOUT WHAT ELSE? THOSE
12 ARE THE TWO THINGS THAT I'VE GOTTEN DOWN SO FAR.

13 WHAT ELSE HAVE YOU BEEN REQUESTED TO TESTIFY
14 ABOUT AND HAVE AGREED TO TESTIFY ABOUT AND FEEL COMPETENT TO
15 TESTIFY ABOUT, IF ANYTHING?

16 A. I THINK IF YOU SIMPLY BROADEN THOSE TWO AREAS
17 OUT, YOU HAVE MY AREAS OF EXPERTISE.

18 Q. WELL, BROADEN THEM OUT IN WHAT WAY?

19 MR. ELSTEAD: WELL, THAT'S UP TO YOU TO DO.

20 MS. REMMERS: NO, IT'S NOT UP TO ME.

21 MR. ELSTEAD: IT IS. IT IS.

22 THE WITNESS: I JUST DON'T WANT TO BE LIMITED.

23 MS. REMMERS: THE PROBLEM IS, I'VE NOT BEEN GIVEN
24 AN ANSWER ABOUT WHAT HE'S BEEN ASKED TO TESTIFY ABOUT.

25 MR. ELSTEAD: NO, WHAT YOU DID WAS TRAP YOURSELF
26 BY TRYING TO SUMMARIZE A WHOLE DAY'S DEPOSITION, AND THE

1 SUMMARY WAS INADEQUATE, AND NOW YOU'RE ASKING ABOUT IT.

2 MS. REMMERS: HE'S TESTIFIED NOBODY, NOT YOU OR
3 CO-COUNSEL, HAS ASKED HIM TO TESTIFY ABOUT ANYTHING. I'M
4 HAVING TO EXTRAPOLATE ABOUT WHAT HE THINKS HE'S GOING TO
5 TESTIFY ABOUT. I WAS ATTEMPTING TO SUMMARIZE THAT HE IS
6 GOING TO TESTIFY ABOUT THE VINDICTIVE NATURE OF THE CHURCH
7 AND WHAT THEY DO TO PEOPLE WHO COMPLAIN IN BROAD TERMS, AND
8 THE SECOND THING, HE HAS SEEN SOME OF THIS COURSE WORK WHEN
9 HE WAS A CHURCH MEMBER BEFORE 1981.

10 THE WITNESS: RIGHT, AND THAT THE COURSES ARE
11 SCIENOTOLOGY.

12 BY MS. REMMERS: Q. THEY'RE SCIENOTOLOGY
13 RELIGION?

14 A. THAT THEY ARE SCIENOTOLOGY.

15 Q. ARE THEY RELIGIOUS TEACHINGS, MR. ARMSTRONG?

16 A. NO, BUT THAT SCIENOTOLOGY CLAIMS THAT THEY ARE
17 SCRIPTURES.

18 Q. SO DO THE SCIENOTOLOGISTS THEMSELVES IN YOUR
19 OPINION BELIEVE THAT THESE ARE RELIGIOUS TEACHINGS, THE
20 DOCUMENTS WE'VE JUST EXAMINED HERE, THE SUCCESS THROUGH
21 COMMUNICATION COURSE, HOW TO INCREASE EFFICIENCY IN YOUR
22 COMPANY COURSE PACK, AND THE OTHER MATERIALS THAT WE LOOKED
23 AT, WHICH YOU HAVE IN FRONT OF YOU NOW, THE KEY TO EFFECTIVE
24 COMPREHENSION, ET CETERA?

25 A. THE SCIENOTOLOGISTS WILL STATE THAT THEY BELIEVE
26 WHAT THEY ARE TOLD TO STATE. WHAT SCIENOTOLOGIST LEGAL

1 REPRESENTATIVES HAVE STATED IS THAT THE MATERIALS WHICH YOU
2 HAVE PRESENTED TO ME AS BEING FROM APPLIED SCHOLASTICS ARE
3 SCRIPTURES.

4 Q. OKAY, I'M ASKING YOU FOR YOUR EXPERT
5 OPINION . . .

6 A. YES.

7 Q. . . . AS SOMEBODY WHO WAS WITHIN THE
8 ORGANIZATION. LET ME START WITH YOUR BELIEF.

9 WHEN YOU WERE IN THE ORGANIZATION AND SAW SIMILAR
10 MATERIALS, DID YOU BELIEVE THEM TO BE RELIGIOUS IN NATURE?

11 A. NO.

12 Q. DO YOU BELIEVE THEM -- DO YOU BELIEVE THAT OTHERS
13 WITHIN THE ORGANIZATION EVEN TODAY BELIEVE THAT THE
14 MATERIALS THAT ARE REPRESENTED HERE, IN SUCCESS THROUGH
15 COMMUNICATION, ET CETERA, ARE RELIGIOUS IN NATURE AS OPPOSED
16 TO TECHNOLOGY OR OTHER WRITINGS?

17 A. YOU'RE MAKING A DISTINCTION THERE WHICH IS NOT
18 WITHIN SCIENTOLOGY TO BE MADE.

19 Q. YOU'RE SAYING --

20 A. WHAT SCIENTOLOGY CLAIMS IS THAT TECHNOLOGY IS --
21 IS RELIGION, AND THAT THEY HAVE A RELIGIOUS TECHNOLOGY, AND
22 THAT THEIR POLICIES REGARDING THREE BASKET SYSTEMS, HOW TO
23 WASH YOUR CAR, FAIR GAME, COMMITTEES OF EVIDENCE, ATTACK THE
24 ATTACKER, ARE SCRIPTURES.

25 Q. SO ARE YOU SAYING THAT THE PEOPLE WHO ARE NOW
26 SCIENTOLOGISTS IN THE ORGANIZATION, THEY TRULY BELIEVE THAT

1 THESE MATERIALS ARE SCRIPTURE AND RELIGIOUS, THE MATERIALS
2 WE'RE TALKING ABOUT?

3 A. I WILL SAY THIS: THAT THE PEOPLE AT THE TOP OF
4 THE ORGANIZATION MAKE THE CLAIM FOR ALL THE ORGANIZATION
5 THAT THOSE MATERIALS WHICH I JUST DESCRIBED, WHICH INCLUDE
6 HOW TO STUDY, HOW TO MANAGE A COMPANY, THAT THOSE ARE
7 SCRIPTURES.

8 Q. OKAY, SO LET ME SUMMARIZE THEN. WHAT YOU'RE
9 SAYING IS -- DOES SCRIPTURE EQUATE TO RELIGIOUS MATERIAL?
10 IT'S RELIGIOUS DOCTRINE OF THE CHURCH OF SCIENTOLOGY?

11 A. LET ME GIVE YOU AN EXAMPLE SO THAT PERHAPS YOU
12 CAN UNDERSTAND. EVEN THOUGH YOU MAY CALL AN ORDER TO GO OUT
13 AND KILL A DOG SCRIPTURE, IT DOES NOT MAKE IT SCRIPTURE, NOR
14 DOES IT MAKE IT RELIGIOUS. NEVERTHELESS, THE PERSON SO
15 ORDERING CAN SAY THAT HIS ORDER TO KILL THE DOG IS A
16 SCRIPTURE.

17 SO DOES SOMEONE BELIEVE THAT? NO, THEY CARRY IT
18 OUT, AND IF HE SAYS IT'S A SCRIPTURE, THEY WILL CALL IT
19 SCRIPTURE. THEY WILL NOT QUESTION IT, AND THEY WILL NOT GO
20 THROUGH THE PROCESS NECESSARY TO CONSIDER IT A BELIEF. IT
21 ISN'T A BELIEF.

22 Q. OKAY, SO IF I UNDERSTAND YOU CORRECTLY, WHAT
23 YOU'RE SAYING IS, THE CHURCH CALLS ALL OF THESE WRITINGS
24 SCRIPTURE?

25 A. RIGHT.

26 Q. BUT THEY DON'T BELIEVE THAT IT'S RELIGIOUS IN

1 NATURE; IS THAT CORRECT?

2 A. BELIEF IS NOT A PART OF SCIENTOLOGY.

3 Q. OKAY. THE INDIVIDUALS WHO WILL SAY THAT THIS
4 MATERIAL IS SCRIPTURE, ACCORDING TO YOU, WILL THEY SAY THE
5 MATERIAL IS RELIGIOUS AND SACRED?

6 MR. ELSTEAD: OBJECTION. CALLS FOR SPECULATION.
7 HE CAN'T KNOW THAT. HE CAN'T TESTIFY ABOUT WHAT SOMEBODY
8 ELSE MIGHT SAY.

9 MS. REMMERS: HE'S THE EXPERT. HE'S BEEN
10 TALKING --

11 MR. ELSTEAD: DOESN'T MEAN HE'S GOD. HE CAN'T
12 SIT HERE AND SAY IF JOE BLOW IS ASKED THIS QUESTION TOMORROW
13 OR SIX MONTHS FROM NOW, WHAT THEY WILL SAY.

14 MS. REMMERS: I'LL GO BACK AND HAVE HIS ANSWER
15 READ. HE SAID THAT --

16 MR. ELSTEAD: ALL HE CAN DO IS EXPLAIN TO YOU
17 WHAT SCRIPTURE IS AND WHAT IN HIS OPINION THE STATUS OF
18 RELIGION IS IN THE SYSTEM AND THE ORGANIZATION OF
19 SCIENTOLOGY.

20 MS. REMMERS: HE'S STARTED TO TALK ABOUT WHAT
21 PEOPLE SAY ABOUT IT.

22 MR. ELSTEAD: ASKING HIM WHAT PEOPLE SAID ABOUT
23 IT AND WHAT THEY MIGHT SAY IN THE FUTURE ARE TWO DIFFERENT
24 THINGS.

25 BY MS. REMMERS: Q. IF I UNDERSTAND YOUR
26 TESTIMONY CORRECTLY, IT'S YOUR BELIEF THAT THE CHURCH SAYS

1 THAT ALL OF THIS MATERIAL IS SCRIPTURE AND MAKES NO
2 DISTINCTION BETWEEN RELIGIOUS TEACHINGS AND NON-RELIGIOUS
3 TEACHINGS; CORRECT?

4 A. CORRECT.

5 Q. HAVE YOU EVER SEEN ANYWHERE WHERE THE CHURCH OR
6 ANY ORGANIZATION USING HUBBARD MATERIALS HAS MADE A
7 DISTINCTION BETWEEN HUBBARD'S TECHNICAL WRITING AND HIS
8 RELIGIOUS OFFERINGS?

9 A. THAT QUESTION DOESN'T MAKE SENSE BECAUSE WHAT
10 THEY CALL TECHNICAL WRITINGS ARE RELIGIOUS OFFERINGS,
11 ALTHOUGH THE CONCEPT RELIGIOUS OFFERINGS IS NOT A PART OF
12 SCIENTOLOGY.

13 Q. MY QUESTION, MR. ARMSTRONG, IS THIS:

14 HAVE YOU EVER SEEN THE CHURCH OR ANY ORGANIZATION
15 THAT USES HUBBARD-BASED MATERIALS MAKE A DISTINCTION BETWEEN
16 RELIGIOUS WRITINGS OF L. RON HUBBARD AND NON-RELIGIOUS
17 WRITINGS?

18 MR. ELSTEAD: OBJECTION. COMPOUND AND AMBIGUOUS.

19 THE WITNESS: YOU'RE SAYING WITHIN THE
20 ORGANIZATION, DO THEY MAKE A DISTINCTION BETWEEN RELIGIOUS
21 WRITINGS AND NON-RELIGIOUS WRITINGS?

22 BY MS. REMMERS: Q. RIGHT.

23 A. THE ONLY DISTINCTION THAT I HAVE SEEN MADE IS
24 BETWEEN HUBBARD'S FICTION AND HIS NON-FICTION. AND THE
25 NON-FICTION IS WHAT THEY DESIGNATE SCRIPTURE. THEY DON'T
26 CALL HIS SCIENCE FICTION WRITINGS SCRIPTURE.

1 Q. DOES, ACCORDING TO YOUR UNDERSTANDING, DOES ALL
2 OF THE WRITINGS OF L. RON HUBBARD THAT, AS YOU SAY, ARE
3 SCRIPTURE, DOES IT ALL CARRY EQUAL WEIGHT IN THE CHURCH? IN
4 OTHER WORDS, IS IT JUST AS SACRED, ONE WRITING AS ANOTHER?

5 A. THERE IS WITHIN THAT BODY THAT THEY CALL
6 SCRIPTURE, A HIERARCHY OF POLICY, POLICY, PROGRAM, PLAN,
7 PROJECT, ORDER. THERE'S A HIERARCHY WITHIN WHAT THEY CALL
8 SCRIPTURE, AND THAT POLICY CANNOT BE INVALIDATED BY AN
9 ORDER, FOR EXAMPLE, AND THAT A HUBBARD POLICY IS SENIOR TO A
10 BOARD POLICY.

11 Q. OKAY. AND --

12 A. NOW, YOU'LL NOTICE THAT IN SOME OF THESE THINGS,
13 THERE'S A REFERENCE TO BOARD POLICIES. AND A BOARD POLICY
14 IS A POLICY INITIATED BY THE BOARD OF DIRECTORS OF THE
15 CHURCH OF SCIENTOLOGY, SO THEY SAY. IT'S A COVER FOR
16 SOMEBODY. BUT IN ANY CASE, THOSE BOARD POLICIES ARE JUNIOR
17 TO A HUBBARD POLICY BUT IT'S ALL SCRIPTURE.

18 DOES THAT MAKE SENSE?

19 Q. NOW, WHEN YOU SAY "SCRIPTURE," AND I THINK, AS
20 YOU TESTIFIED, THAT WORD WAS USED BEFORE YOU LEFT THE CHURCH
21 OF SCIENTOLOGY, WAS IT YOUR UNDERSTANDING BEFORE YOU LEFT
22 THE CHURCH OF SCIENTOLOGY THAT SCRIPTURE EQUATED WITH
23 RELIGIOUS TEACHING; IN OTHER WORDS, SCRIPTURE IS IDENTICAL
24 TO RELIGIOUS TEACHING?

25 A. I UNDERSTOOD BY THE TIME I HEARD THE USE OF THE
26 TERM "SCRIPTURE," WHEN I WAS NEAR THE END OF MY PERIOD

1 INSIDE SCIENTOLOGY, THAT IT WAS YET ANOTHER SCAM WHICH WAS
2 BEING RUN ON THE WORLD AT LARGE IN ORDER TO DEFEND HUBBARD'S
3 AND THE ORGANIZATION'S TORTIOUS ACTIVITIES AGAINST ITS OWN
4 MEMBERS AND AGAINST PEOPLE ON THE OUTSIDE.

5 AND AS A JUSTIFICATION FOR ITS ABHORRENT AND
6 ANTISOCIAL POLICIES, THEY DECIDED WE WILL CALL THESE THINGS
7 SCRIPTURES. THEN WE WILL BE ABLE TO HIDE THOSE ABHORRENT
8 POLICIES A LITTLE BIT BECAUSE, AFTER ALL, THERE'S FREEDOM OF
9 RELIGION. SO NO ONE CAN QUESTION THE TRUTH OR VALIDITY OF
10 THE POLICY BECAUSE IT'S RELIGIOUS SCRIPTURE. IT'S A SCAM.

11 Q. OKAY. SO THE ANSWER TO MY QUESTION IS THAT
12 SCRIPTURE DID EQUATE WITH RELIGION, RELIGIOUS TEACHINGS?

13 MR. ELSTEAD: THAT'S NOT WHAT HE SAID.

14 * MS. REMMERS: HE JUST SAID SCRIPTURE -- IS THAT
15 ONE AND THE SAME AS -- I'M TRYING TO DEFINE SO WE DON'T PASS
16 A WORD WITHOUT UNDERSTANDING.

17 THE WITNESS: SO SCRIPTURE IS, AS SCIENTOLOGY
18 USES THE WORD SCRIPTURE, IS A COVER GIVEN TO HUBBARD'S
19 POLICIES.

20 BY MS. REMMERS: Q. OKAY. WHICH YOU'RE SAYING,
21 IN YOUR OPINION, THEY'RE NOT RELIGION OR RELIGIOUS POLICIES,
22 BUT THERE'S THIS SCAM TO CALL THEM RELIGIOUS POLICIES?

23 A. RIGHT.

24 Q. BY CALLING THEM SCRIPTURE?

25 A. RIGHT.

26 Q. OKAY. AND THAT BEGAN SOMEWHERE WHEN? IN 1980?

1 A. OH, THAT WAS JUST A PIECE -- YOU WON'T FIND THE
2 WORD "SCRIPTURES" IN SCIENTOLOGY LITERATURE UP UNTIL 1981,
3 '82, '83 PERIOD.

4 Q. AND YOU WERE GONE BY THEN; ISN'T THAT RIGHT?

5 A. RIGHT, IT BEGAN TO COME IN AS I WAS GOING OUT,
6 AND IT WAS ANOTHER PIECE OF THE SCAM.

7 Q. SO SINCE DECEMBER OF 1981, WHEN YOU LEFT; RIGHT?

8 A. RIGHT.

9 Q. YOU DON'T HAVE ANY PERSONAL KNOWLEDGE REALLY OF
10 HOW SCIENTOLOGISTS VIEW HUBBARD'S WRITINGS AT THE MOMENT
11 OTHER THAN WHAT YOU'VE READ; CORRECT?

12 A. RIGHT, WHAT I'VE READ.

13 MS. REMMERS: OKAY. WE ARE NOT OBVIOUSLY GOING
14 TO BE ABLE TO FINISH, AND I HAVE TO HAVE HIM COME BACK.

15 MR. ELSTEAD: JUST A TWO-MINUTE BREAK BEFORE YOU
16 GO, AND THEN I'LL TALK TO YOU IN JUST A MOMENT.

17 (MR. ELSTEAD CONFERRED WITH THE WITNESS)

18 (5-MINUTE RECESS)

19 MR. ELSTEAD: YOU MIGHT WANT TO ASK HIM AGAIN
20 ABOUT WHAT I HAD ASKED HIM TO TESTIFY TO ABOUT. HE
21 MISUNDERSTOOD YOUR QUESTION HAVING TO DO WITH THAT
22 PARTICULAR CONVERSATION, THE ONE MEETING THAT WE HAD. HE
23 THOUGHT WHEN YOU ASKED THAT QUESTION, YOU WERE STILL
24 REFERRING TO THE FIRST MEETING THAT I HAD WITH HIM ABOUT
25 THIS CASE AT THE COFFEE SHOP IN BERKELEY.

26 BY MS. REMMERS: Q. LET ME ASK YOU WHAT

1 MR. ELMSTEAD JUST TALKED WITH YOU ABOUT IN YOUR
2 APPROXIMATELY FIVE-MINUTE CONVERSATION OUT IN THE HALL?

3 A. HE THOUGHT THAT YOU GOT A WRONG IMPRESSION FROM
4 AN ANSWER THAT I GAVE, AND THAT WAS REGARDING THE MEETING AT
5 OLIVETO'S, WHERE I SAID, AT THAT TIME, THAT IN MY ASSESSMENT
6 AT HAVING TALKED TO THE PLAINTIFFS, THAT I FELT THAT MY
7 AREAS OF EXPERTISE WERE --

8 Q. I THOUGHT YOU HAD TALKED TO THE PLAINTIFFS AFTER
9 YOU HAD THIS MEETING WITH MR. ELSTEAD?

10 MR. ELSTEAD: NO, THAT'S NOT WHAT HE TESTIFIED
11 TO.

12 BY MS. REMMERS: Q. YOU TESTIFIED THE FIRST
13 THING HAPPENED --

14 A. NO, HAVING TALKED TO RUMMONDS, RIGHT, AND
15 UNDERSTANDING WHAT THE CASE WAS TO THAT TIME, THAT I WOULD
16 TESTIFY AS TO THOSE TWO AREAS. ONE --

17 Q. RIGHT.

18 ONE WHAT?

19 A. OKAY, ONE ABOUT SCIENTOLOGY PRACTICES, ABOUT FAIR
20 GAME, ABOUT WHAT HAPPENS TO SOMEONE WHO BECOMES CRITICAL OF
21 THE ORGANIZATION.

22 TWO, THAT THIS WAS SCIENTOLOGY, SCIENTOLOGY
23 COURSES, WHICH APPLIED SCHOLASTICS WAS ATTEMPTING TO HAVE
24 IMPLEMENTED INSIDE APPLIED MATERIALS.

25 Q. YOU TOLD MR. ELSTEAD YOU WOULD TESTIFY TO THOSE
26 TWO THINGS?

1 A. RIGHT.

2 Q. DID HE ASK YOU TO TESTIFY TO ANYTHING IN
3 ADDITION?

4 A. RIGHT.

5 Q. WHAT -- AND THIS IS WHAT HE JUST TOLD YOU OUT IN
6 THE HALL?

7 MR. ELSTEAD: NO, THAT'S A MISREPRESENTATION.
8 WHEN I WENT OUT IN THE HALL WITH HIM, IT WAS TO CLARIFY A
9 MISIMPRESSION.

10 YOU ASKED HIM, WHAT HAD I ASKED HIM TO TESTIFY
11 ABOUT? AND IN RESPONSE TO YOUR QUESTION, HE MISUNDERSTOOD
12 IT AS REFERRING ONLY TO THE CONVERSATION WE HAD AT THE
13 COFFEE SHOP.

14 I HAD ASKED HIM OTHER THINGS. SO THAT YOU WON'T
15 BE MISLED ABOUT WHAT HE'S GOING TO TESTIFY AT TRIAL, I SAID,
16 "PLEASE EXPLAIN TO HER."

17 BY MS. REMMERS: Q. WHAT OTHER THINGS ARE YOU
18 GOING TO TESTIFY ABOUT?

19 A. THAT IS THE PURPOSE OF THE COURSES WHICH APPLIED
20 SCHOLASTICS TAUGHT, ATTEMPTED TO TEACH, IMPLEMENT IN APPLIED
21 MATERIALS. THE COURSES ARE INTRODUCTORY INDOCTRINATION
22 COURSES. THEY PROGRAM ONE TO BE A SCIENTOLOGIST.

23 THE PRODUCT OF THE -- WHAT WAS CALLED THE HUBBARD
24 APPRENTICE SCIENTOLOGIST COURSE, OR THE H.A.S. COURSE, OR
25 THE COMMUNICATION COURSE, IS A SCIENTOLOGIST. SO THE
26 TR'S --

1 Q. IS THAT WRITTEN SOMEWHERE?

2 A. YEAH.

3 Q. WHERE?

4 A. IN HUBBARD'S BULLETINS.

5 Q. WHAT BULLETIN?

6 A. BULLETIN CONCERNING THE H.A.S. COURSE, BUT I CAN
7 FIND THAT IN THE RED VOLUMES.

8 Q. IN THE WHAT VOLUMES?

9 A. RED.

10 Q. ARE THOSE IN YOUR POSSESSION?

11 A. SOME OF THEM, YEAH. TECHNICAL VOLUMES.

12 HUBBARD DIVIDED UP SCIENTOLOGY INTO THE HUNZIKER
13 COB'S, HUBBARD'S COMMUNICATIONS OFFICE BULLETINS, AND
14 HCOL'S, HUBBARD COMMUNICATION OFFICE LETTERS. ONE WAS
15 ADMINISTRATIVE TECHNOLOGY, ONE WAS AUDITING TECHNOLOGY.
16 BOTH OF THEM ARE CONSIDERED FOR LEGAL PURPOSES BY THE
17 ORGANIZATION SCRIPTURES.

18 BUT THE TR, GOING BACK TO THAT, BOTH OF THOSE
19 COURSES, ONE, THE ADMINISTRATIVE ONE, THE MISUNDERSTOOD
20 WORDS, THOSE INDOCTRINATE ONE TO BECOME A SCIENTOLOGIST.

21 Q. AND THIS IS IN THIS RED VOLUME THAT IS CURRENTLY
22 IN YOUR POSSESSION, THAT YOU PLAN TO REVIEW, TO PULL OUT, TO
23 FORM YOUR OPINION OR TO SUPPORT YOUR OPINION; IS THAT RIGHT?

24 YOU TESTIFIED EARLIER THAT YOU HAD SOME DOCUMENTS
25 IN YOUR POSSESSION YOU WERE PLANNING TO REVIEW?

26 A. RIGHT.

1 Q. AND THAT'S AMONG THEM?.

2 A. RIGHT.

3 Q. WELL, LET ME ASK YOU SOMETHING.

4 WHEN YOU WERE TALKING TO STEVEN HUNZIKER AND
5 VIRGINIA SANDERS, DID STEVEN TELL YOU THAT HE RECEIVED SOME
6 KIND OF DOCUMENT IN THE MAIL, ANONYMOUS? DID THAT COME UP
7 AT ALL?

8 A. I HAVE A RECOLLECTION OF IT. I DON'T RECALL THE
9 DESCRIPTION OF IT, BUT YOU COULD REFRESH MY MEMORY.

10 Q. LIKE A 1-PAGE DOCUMENT THAT SAID SOMETHING, "YOU
11 CAN BE REFORMED --"?

12 A. YEAH.

13 Q. DID YOU TALK ABOUT THAT AT ALL?

14 A. HE JUST MENTIONED, MENTIONED THAT HE HAD RECEIVED
15 IT.

16 Q. DID YOU FORM AN OPINION ABOUT WHETHER THAT WAS A
17 SCIENTOLOGY TECHNIQUE, TO SEND THAT KIND OF THING TO
18 SOMEONE?

19 A. NO. THAT IS, I DIDN'T FORM AN OPINION.

20 Q. HAVE YOU EVER SEEN A SCIENTOLOGIST SEND A
21 DOCUMENT SAYING YOU CAN BE REFORMED TO SOMEBODY WHO HAS
22 DISSENTED?

23 A. I HAVE NO KNOWLEDGE.

24 Q. OKAY, OBVIOUSLY, WE'RE NOW AT FIVE AFTER 5:00 AND
25 I HEAR FOR THE FIRST TIME THAT ONE OF THE THINGS YOU'RE
26 GOING TO TESTIFY TO IS THE PURPOSE OF THE COURSES TAUGHT BY

1 APPLIED SCHOLASTICS?

2 A. I ACTUALLY HAD GONE INTO THIS SOMETIME EARLIER IN
3 THE DEPOSITION, BUT MR. ELSTEAD DID BRING THAT TO MY
4 ATTENTION.

5 Q. IS THERE ANYTHING ELSE THAT YOU HAVE AGREED TO
6 TESTIFY ABOUT . . .

7 A. (WITNESS SHAKES HEAD)

8 Q. . . . THAT YOU HAVE FORGOTTEN?

9 A. NO.

10 Q. THERE'S A LOT MORE WE NEED TO GO INTO, OBVIOUSLY.
11 YOU TESTIFIED, FOR INSTANCE, THAT YOU ARE PLANNING TO
12 TESTIFY ABOUT SCIENTOLOGY PRACTICES; YOU MENTIONED FAIR
13 GAME. I DON'T KNOW WHAT OTHER PRACTICES.

14 CAN YOU LIST FOR ME WHAT OTHER PRACTICES YOU PLAN
15 TO TESTIFY ABOUT?

16 A. THERE ARE A LOT OF -- FAIR GAME IS A STATEMENT OF
17 A DOCTRINE FROM WHICH FLOW A LOT OF PRACTICES. BUT BLACK
18 PR --

19 Q. LET ME STOP YOU. ARE ALL THE PRACTICES YOU
20 INTEND TO TESTIFY ABOUT PRACTICES THAT RELATE TO SOMEBODY --
21 PRACTICES THAT RELATE TO SOMEBODY IF THEY OBJECT TO
22 SCIENTOLOGY?

23 A. RIGHT, THOSE PEOPLE WHO OBJECT TO SCIENTOLOGY.
24 SO BLACK PR IS ONE OF THOSE. IT APPEARS THAT HUNZIKER WAS
25 THE TARGET OF A BLACK PR CAMPAIGN WITHIN APPLIED MATERIALS.

26 Q. AND THAT'S BASED UPON YOUR DISCUSSIONS WITH HIM?

19
1 A. RIGHT.

2 Q. HAVE YOU TALKED TO ANYBODY WHO HAS ANY OTHER
3 FACTS?

4 A. NO.

5 Q. HAVE YOU READ ANY OF THE DEPOSITION TESTIMONY OF
6 ANY OF THE DEFENDANTS IN THIS CASE?

7 A. NO.

8 Q. ANY OF THE DEFENDANT MANAGERS?

9 A. NO.

10 Q. OF ANY OF THE PEOPLE WHO WERE ACTUALLY TALKING
11 WITH STEVEN HUNZIKER IN THIS PERIOD OF TIME, TRYING TO GET
12 HIM TO DO HIS WORK?

13 A. NO.

14 Q. OKAY, WE'RE GOING TO OBVIOUSLY HAVE TO CONTINUE.
15 CERTAINLY.

16 WHEN DO YOU EXPECT TO HAVE COMPLETED YOUR
17 ANALYSIS AND REVIEW SO I CAN HAVE A FAIR UNDERSTANDING OF
18 YOUR OPINIONS AND WHAT YOU'VE BASED THEM ON?

19 A. OKAY, TWO WEEKS. I HAVE A TRIP WHICH I HAVE TO
20 TAKE BETWEEN NOW AND THEN, AT WHICH -- AND UPON WHICH, MY
21 RETURN FROM THAT TRIP, I WILL HAVE EVERYTHING READY.

22 MS. REMMERS: WE'LL BE BEYOND THE CUT OFF. WE
23 NEED TO PREPARE FOR --

24 MR. ELSTEAD: YOU'LL BE ALLOWED TO --

25 MS. REMMERS: THAT'S NOT MY ISSUE.

26 MR. ELSTEAD: YOU'RE GOING TO GET TO PREPARE FOR

1 TRIAL. YOU ASKED HIM A LOT OF QUESTIONS TODAY. I DON'T
2 THINK YOU HAVE A FREE DAY TO DO HIM ANYWAY. BY THE END OF
3 NEXT WEEK, HE'LL HAVE THE STUFF TOGETHER AND YOU CAN TAKE
4 HIS DEPOSITION AND FINISH IT. YOU'RE OBVIOUSLY NOT FINISHED
5 WITH HIM, EVEN WITH THAT.

6 MS. REMMERS: I MIGHT STAY AND FINISH, KEEP HIM
7 HERE, IF WE COULD DO THAT, BUT HE HASN'T DONE HIS
8 FUNDAMENTAL WORK AS FAR AS I CAN TELL.

9 OKAY. WELL, YOU SAY TWO WEEKS?

10 THE WITNESS: YEAH.

11 MS. REMMERS: OKAY. WE'LL MAKE ARRANGEMENTS.

12 MR. ELSTEAD: YOU'RE GOING TO HAVE TO DO THAT AS
13 FAST AS YOU CAN. SHE'S RIGHT, YOU'VE GOT TO DO THIS.

14 THE WITNESS: RIGHT, I KNOW.

15 MR. ELSTEAD: WHEN YOU DO IT, YOU HAVE TO LET ME
16 KNOW, AND WE'LL GET IT PUT TOGETHER.

17 THE WITNESS: I CAN.

18 MS. REMMERS: OFF THE RECORD.

19 (DISCUSSION OFF THE RECORD)

20 (THE DEPOSITION WAS ADJOURNED AT 5:15 P.M. AND
21 WAS CONTINUED TO FEBRUARY 12, 1992)

--000--

I HAVE READ THE FOREGOING DEPOSITION. THE
ANSWERS TO THE QUESTIONS ARE TRUE OF MY OWN KNOWLEDGE. I
DECLARE UNDER THE PENALTY OF PERJURY, THAT THE FOREGOING
DEPOSITION IS TRUE AND CORRECT.

SIGNATURE OF WITNESS.

DATE OF SIGNATURE.

--000--

() THE DEPONENT FAILED TO APPEAR IN ORDER TO APPROVE OR
SIGN HIS/HER DEPOSITION.

() THE DEPONENT REFUSED TO APPROVE OR SIGN HIS/HER
DEPOSITION FOR THE FOLLOWING REASON: _____

() THE DEPONENT APPROVED HIS/HER DEPOSITION BY THE
LETTER ATTACHED HERETO AND MADE A PART OF THE DEPOSITION
HEREIN.

--000--

1 STATE OF CALIFORNIA)
2) SS.
3 COUNTY OF SONOMA)

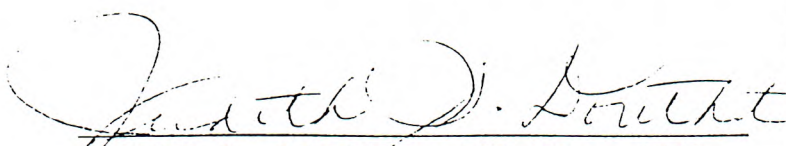
4 I, JUDITH S. DOUTHIT, A CERTIFIED SHORTHAND
5 REPORTER, NO. 4531, LICENSED BY THE STATE OF CALIFORNIA,
6 EMPOWERED TO ADMINISTER OATHS AND AFFIRMATIONS PURSUANT TO
7 SECTION 2093(B) OF THE CODE OF CIVIL PROCEDURE, DO HEREBY
8 CERTIFY THAT

9 GERALD ARMSTRONG,

10
11 A WITNESS IN THE FOREGOING DEPOSITION, WAS BY ME DULY SWORN
12 TO TESTIFY THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE
13 TRUTH IN THE WITHIN-ENTITLED CAUSE; THAT SAID TESTIMONY OF
14 SAID WITNESS WAS REPORTED BY ME, A DISINTERESTED PERSON, AND
15 WAS THEREAFTER TRANSCRIBED UNDER MY DIRECTION INTO
16 TYPEWRITING.

17 I FURTHER CERTIFY THAT I AM NOT OF COUNSEL OR
18 ATTORNEY FOR EITHER OR ANY OF THE PARTIES IN THE FOREGOING
19 DEPOSITION AND CAPTION NAMED, NOR IN ANY WAY INTERESTED IN
20 THE OUTCOME OF THE CAUSE NAMED IN SAID CAPTION.

21
22 DATED THE 9TH DAY OF FEBRUARY 1992.

23
24
25 
26 JUDITH S. DOUTHIT, CSR NO. 4531